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Attorney for Defendant Kohl's
Department Stores, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CAROLYN MARTIN,

Plaintiff,

vs.

KOHL'S DEPARTMENT STORES, INC;
HARSCH INVESTMENT REALTY LLC,
SERIES C; JAMESTOWN HARSCH
ALAMEDA TOWNE CENTRE, LP, a
Delaware Limited Partnership, and DOES
1-25, inclusive,

Defendants.

Case No. C10-05195 JSW
Civil Rights

**STIPULATION AND PROPOSED
ORDER TO CONTINUE CASE
MANAGEMENT CONFERENCE
PENDING SETTLEMENT**

[Assigned to Honorable Jeffrey S. White]

1 Defendant Kohl's Department Stores, Inc. ("Defendant" or "Kohl's") and
 2 Plaintiff Carolyn Martin ("Plaintiff") by and through their attorneys of record, enter
 3 into this Stipulation and Proposed Order to Continue the Case Management
 4 Conference (the "Stipulation and Order") currently set for Friday, April 26, 2013 at
 5 1:30 p.m. in Courtroom 11, on the 19th Floor of the above-captioned court, before the
 6 Honorable Judge Jeffrey S. White.

7 Plaintiff and Defendant have reached an agreement in principle to resolve all
 8 remaining issues in the case including Plaintiff's claims for damages, attorney's fees,
 9 litigation expenses, and costs claimed in the lawsuit against Defendant. Accordingly,
 10 Defendant and Plaintiff have stipulated to continue the Case Management Conference
 11 to provide the parties with sufficient time to document and finalize the settlement
 12 agreement.

13 Defendant and Plaintiff request that the Court continue the Case Management
 14 Conference in this matter to June 28, 2013 at 1:30 p.m., with joint case management
 15 statements to be filed with the Court by June 21, 2013. In the event settlement is
 16 reached by the parties and dismissals are filed with the Court on or before June 21,
 17 2013, the Case Management Conference will automatically be removed from the
 18 Court's calendar.

19 This Stipulation and Order may be signed in counterparts, and facsimile or
 20 electronically transmitted signatures shall be as valid and as binding as original
 21 signatures.

22 Wherefore, Defendant and Plaintiff, by and through their attorneys of record, so
 23 stipulate.

24
 25
 26 Dated: April 23, 2013

By: 

Timothy L. Pierce
 Attorney for Defendant Kohl's
 Department Stores, Inc.

SIDNEY J. COHEN
PROFESSIONAL CORPORATION

Dated: April 23, 2013

By: 

Sidney J. Cohen
Attorney for Plaintiff
Carolyn Martin

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED:

The Case Management Conference currently scheduled for April 26, 2013 is continued to June 28, 2013 at 1:30 p.m. In the event settlement is reached by the parties and dismissals are filed with the Court on or before June 21, 2013, the Case Management Conference will automatically be removed from the Court's calendar.

Date: April 24, 2013

By: 

Jeffrey S. White
United States District Judge